UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD WASHINGTON, DC

)))
)
) Case No. 15-RC-8773
)
)

EMPLOYER'S RESPONSE TO AMICUS CURIAE COALITION FOR A DEMOCRATIC WORKPLACE'S REQUEST FOR EXTENSION OF TIME TO FILE BRIEFS

Specialty Healthcare and Rehabilitation Center of Mobile, Employer in this case, hereby joins the Coalition for a Democratic Workplace ("CDW") in its request for an extension of thirty (30) days in which to file Briefs in response to the National Labor Relations Board's Decision in the above-referenced matter, issued December 22, 2010. Responsive Briefs are currently due on February 22, 2011; however, the Employer concurs with CDW that the breadth and complexity of the issues raised in the Decision warrant an extension of thirty (30) days for the filing of Briefs.

As such, the Employer does not oppose any extension of time, and joins CDW in requesting a 30-day extension for filing the Employer's Brief.

Respectfully submitted, this 26th day of January, 2011.

(Signatures on Following Page)

Clifford H. Nelson, Jr., Esq.

CONSTANGY, BROOKS & SMITH, LLP

230 Peachtree Street, NW, Suite 2400

Atlanta, Georgia 30303-1557 Telephone: (404) 230-6714

Facsimile: (404) 525-6955

Charles P. Roberts III, Esq.

CONSTANGY, BROOKS & SMITH, LLP

100 N. Cherry St., Suite 300 Winston-Salem, NC 27101-4016

Telephone: (336) 721-1001 Facsimile: (336) 748-9112

Edward J. Goddard, Esq.

KINDRED HEALTHCARE, INC.

680 South Fourth Street Louisville, KY 40202

Telephone: (502) 596-7244 Facsimile: (774) 847-9356

ATTORNEYS FOR SPECIALTY HEALTHCARE AND REHABILITATION CENTER OF MOBILE

UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD WASHINGTON, DC

SPECIALTY HEALTHCARE AND REHABILITATION CENTER OF MOBILE	
Employer,)
and) Case No. 15-RC-8773
UNITED STEEL WORKERS, DISTRICT 9,)
Petitioner.)) _)

CERTIFICATE OF SERVICE

I certify I have filed one electronic copy of <u>EMPLOYER'S RESPONSE TO AMICUS CURIAE COALITION</u> <u>FOR A DEMOCRATIC WORKPLACE'S REQUEST FOR EXTENSION OF TIME TO FILE BRIEFS</u> via the NLRB website. In addition, I certify that I have provided copes via UPS Overnight Delivery to:

Randy Rigsby Staff Organizer USW, District 9 1900 Crestwood Blvd., Suite 302 Irondale, AL 35210

G. Roger King (Counsel of Record, DCW) Jones Day 325 John H. McConnell Blvd. Columbus, Ohio 43215-2673

R. Scott Medsker Jones Day 51 Louisiana Ave., N.W. Washington, D.C. 20001

This 26th day of January, 2011.

Leigh E. Tyson, Esq.

Constangy, Brooks and Smith, LLC